

**EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

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|-----------------------------------|---|------------------------------|
| DEREK LANEY, |) | |
| |) | |
| Plaintiff, |) | Case No. 4:18-CV-1575 |
| |) | |
| v. |) | JURY TRIAL DEMANDED |
| |) | |
| CITY OF ST. LOUIS, et al., |) | |
| |) | |
| Defendants. |) | |

**DEFENDANTS' MOTION
FOR LEAVE TO FILE EXHIBITS UNDER SEAL**

Defendants, City of St. Louis, and Lt. Scott Boyher. Lt. Col. Lawrence O'Toole and Charelene Deeken (collectively "Defendants"), through counsel and respectfully request that this Court grant Defendants leave to file Exhibits O and P to their Reply in Support of their Motion for Summary Judgment under seal under seal. In support, Defendants state as follows:

1. On November 8, 2019. This Court entered an agreed upon protective order in this case. (Doc. 41).
2. That order provides that if a need arises for documents produced with a "Confidential" designation to be filed under seal by motion. (Doc. 41)
3. Exhibits O and P are documents produced with a "Confidential" designation as they are confidential personnel records.
4. The "Confidential" designation has never been challenged.
5. Under the terms of the protective order, and pursuant to Local Rule 13.05, Defendants respectfully request that Exhibits O and P be filed under seal.

WHEREFORE, Defendants respectfully request that this Court grant Defendants

leave to file Exhibits O and P to their Motion for Summary Judgment under seal.

Respectfully submitted,

MICHAEL A. GARVIN
CITY COUNSELOR

/s/ Brandon Laird

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